

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANGELA SANTIAGO,

Plaintiffs,

v.

GEICO ADVANTAGE INSURANCE  
COMPANY,

Defendant.

No. 2:22-cv-01370-RSL

**STIPULATED MOTION AND ORDER  
TO CONTINUE EXPERT  
DISCLOSURE DEADLINE**

**COME NOW** the Plaintiff ANGLEA SANTIAGO (“Plaintiff”) and Defendant GEICO ADVANTAGE INSURANCE COMPANY (“Defendant”) (collectively “the Parties”), by and through their counsel of record, and respectfully move this Court, via stipulation to continue the expert disclosure deadline.

**I. STIPULATION**

**A. Overview**

1. The Parties make this motion in good faith and not for the purpose of delay.
2. This claim arises out of a claim for insurance benefits relating to a motor vehicle accident. Plaintiff alleges Defendant acted in bad faith in the manner it handled the investigation of the underinsured motorist claim. Defendant disputes those allegations.

3. Under the current case scheduling order, the jury trial in this matter is currently set for **October 2, 2023**. *See* Dkt. 8 (Order Setting Trial and Pretrial Dates). The jury trial is expected to last approximately seven (7) days. *Id.*
4. Also under the current case scheduling Order, the reports from expert witnesses under FRCP(a)(2) are due **April 5, 2023**.
5. For the reasons set forth below, the Parties are requesting an approximate 1-month continuance for the expert disclosure deadline *only*. The Parties request that the Court also extend and modify the deadline as set forth below.

**B. Continuance is in the interest of Justice**

1. Plaintiff's deposition is currently scheduled for March 29, 2023. Responses to Plaintiff's discovery is also pending entry of protective orders. This comes a week prior to the deadline for the disclosure of expert witnesses. The parties seek a one-month continuance for this deadline only so that expert disclosures would be due on May 5, 2023. This continuance would allow the parties to properly disclose experts that may be retained based on the outcome of Plaintiff and Plaintiff's husband's depositions and responses to Plaintiff's discovery. This continuance is not requested to delay this case, rather it is made so that the parties may be given sufficient time to prepare their cases.

**C. Relief Requested**

6. In consideration of the above, the Parties respectfully seek an approximate one (1) month continuance of the Expert Disclosure deadline only with all other deadlines to remain the same.

1           7.       This stipulated request is not made for the purpose of delay, but rather to allow  
2                   sufficient time to prepare this case for trial.

3           8.       Based on the foregoing, the Parties respectfully request this Court enter an order  
4                   resetting the Expert Disclosure deadline in this matter to **May 5, 2023**.

5           For the above reasons, the Parties jointly request that the Court grant this stipulated motion  
6           to continue the deadlines as set forth above.

7  
8           RESPECTFULLY SUBMITTED 27<sup>th</sup> day of March, 2023 at Seattle, Washington.

9  
10          **WATHEN | LEID | HALL | RIDER, P.C.**

10          **CLAUSEN LAW FIRM**

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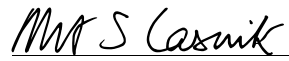
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**II. ORDER**

**IN CONFORMITY** with the foregoing Stipulation, **IT IS SO ORDERED.**

Dated this 28th day of March, 2023.



Robert S. Lasnik  
United States District Judge